UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JANE DOE NO. 1, et al.,)
Plaintiffs,)
v.))
BACKPAGE.COM, LLC, CARL FERRER, MICHAEL LACEY, and JAMES LARKIN,) Docket No. C.A. 17-cv-11069-LTS)
Defendants.)

NOTICE OF INTENT TO WAIVE RIGHT TO SEEK LEAVE TO REPLY TO OPPOSITION TO MOTION TO STAY PROCEEDINGS

Defendants Michael Lacey and James Larkin (collectively, "Movants"), hereby notify the Court that, without conceding Plaintiffs' citation to or application of case law in their Opposition (ECF 87) to the Motion to Stay Proceedings (ECF 86), or agreeing with the Opposition's aspersions and opprobrium, or characterizations of this proceeding or of any other, Movants do not object, as indicated in the alternative relief stated in their Motion, to entry of a stay of this case as to Messrs. Lacey and Larkin, that allows the matter to proceed as to Defendants Backpage.com, LLC, and Carl Ferrer, as Plaintiffs propose in their Opposition. No reply to the Opposition is thus required or anticipated.

Date: August 10, 2018

Respectfully submitted,

/s/ Robert Corn-Revere

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2018, the foregoing document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and by first-class mail to any non-registered participants.

/s/ Robert Corn-Revere
Robert Corn-Revere